## **EXHIBIT 1**

Case: 1:22-cv-02000-JPC Doc #: 1-1 Filed: 11/04/22 2 of 29. PageID #: 7

Filing # 86044 / 22CV001304 / LUCCI, EUGENE A.

Lake Co Common Pleas Court, Clerk Faith Andrews 10/05/2022 03:43 PM

## IN THE COURT OF COMMON PLEAS LAKE COUNTY, OHIO

BRIANNA GROSKOPF 455 Riverdale Drive Eastlake, Ohio 44095	) CASE NO. )
Plaintiff,	) ) JUDGE:
VS.	) COMPLAINT FOR DAMAGES ) AND REINSTATEMENT
STERIS CORPORATION	)
5960 Heisley Road	)
Mentor, Ohio 44060	) <u>JURY DEMAND ENDORSED</u> ) <u>HEREIN</u>
Serve Also: STERIS CORPORATION c/o CT CORPORATION SYSTEM Statutory Agent 4400 Easton Commons Way, Suite 125 Columbus, Ohio 43219 -and-	) ) ) ) ) ) ) ) ) )
ADAM SMITH c/o Steris Corporation 5960 Heisley Road Mentor, Ohio 44060	) ) ) )
Defendants.	)

Plaintiff Brianna Groskopf, by and through her undersigned counsel, as her Complaint against Defendants Steris Corporation and Adam Smith, hereby states and avers the following:

### **PARTIES, VENUE & JURISDICTION**

1. Groskopf is a natural person and resident of the City of Eastlake, County of Lake, State of Ohio.

- Defendant Steris Corporation ("Steris") is a domestic, for-profit corporation organized under the laws of the State of Ohio, with a principal place of business located at 5960 Heisley Road, Mentor, Ohio 44060.
- 3. At all times relevant herein, Steris was Groskopf's "employer" within the meaning of Ohio Revised Code Section 4112.01(A)(2).
- 4. At all times relevant herein, Defendant Adam Smith was Groskopf's supervisor.
- 5. Steris and Smith may be collectively referred to as "Defendants."
- 6. All material events giving rise to this Complaint occurred in Lake County, Ohio.
- 7. Personal jurisdiction is proper over Defendants pursuant to Ohio Revised Code § 2307.382(A)(1).
- 8. Venue is proper pursuant to Civ. R. 3(C)(1), (2), (3) and (6).
- 9. This Court is a court of general jurisdiction over the claims presented herein, including all subject matters of this Complaint.
- 10. Within 300 days of the conduct alleged below, Groskopf filed a Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC"), Charge No. 532-2022-00790.
- 11. Groskopf dually filed the EEOC Charge with the Ohio Civil Rights Commission.
- 12. The EEOC issued a Right to Sue Letter for Charge No. 532-2022-00790 on or about July 11, 2022, a copy of which is attached hereto as Plaintiff's Exhibit 1.
- 13. Groskopf filed this Complaint within the time allowed by statute and has exhausted her administrative remedies.

### **FACTS**

- 14. Groskopf is a former employee of Steris.
- 15. Groskopf began working for Steris in or around August 2017.
- 16. Groskopf was employed by Steris as a Production Assembler.

- 17. In or around 2019, Smith admonished Groskopf for taking lengthy restroom breaks.
- 18. Groskopf told Smith she took enough time to properly disrobe, use the restroom, and reapply her mandatory Personal Protective Equipment ("PPE").
- 19. Smith told Groskopf if she ever took longer than a five-minute restroom break, he would not pay for the time of the break.
- 20. Smith timed the female employee restroom breaks by making the females clock in and clock out for each restroom break.
- 21. Smith did not time the male employees' restroom breaks.
- 22. Groskopf observed that Smith did not admonish nor threaten the male employees for the length of their restroom breaks.
- 23. Groskopf was frustrated about this disparate treatment because the PPE each employee wore during shifts caused the restroom breaks to take longer
- 24. The PPE, which included a hairnet, lab coat, safety glasses, gloves, and mask, had to be removed and stored in a locker.
- 25. Each employee had to wash hands in the restroom, then wash again before replacing the PPE to return to shift.
- 26. Despite the male employees having to go through the same PPE process as the females, Smith only harassed the females about the restroom timing.
- 27. Smith issued a written discipline to Groskopf for using the restroom.
- 28. Groskopf wrote a statement reporting Smith for disciplining female employees for restroom breaks.
- 29. Groskopf's statement was not kept confidential it was shown to all the employees in Groskopf's work area.

- 30. Once other employees began discussing Groskopf's statement and the Smith write-up, Smith told Groskopf her discipline was not about her restroom break, but because she caused "drama" at work.
- 31. Smith did not accuse male employees of creating "drama" at work.
- 32. Causing "drama" at work is antiquated stereotype used to discredit female employees after female employees complain or report discrimination.
- 33. On or about December 15, 2020, Groskopf had to guarantine after contracting COVID-19.
- 34. Steris is a covered employer under the Family and Medical Leave Act ("FMLA").
- 35. Groskopf was qualified to take FMLA leave.
- 36. Groskopf applied for and was approved for FMLA leave to take care of her COVID-19 related health issues.
- 37. Groskopf's medical leave was covered under FMLA until March 9, 2021.
- 38. Groskopf's COVID-19 infection was severe, resulting in serious symptoms and multiple positive test results.
- 39. Groskopf regularly contacted Steris's human resources department with updates on her condition.
- 40. On or about March 5, 2021, Groskopf informed Steris of her doctor's return to work estimate of March 15, 2021.
- 41. Miley Last Name Unknown ("LNU"), the human resources representative who spoke with Groskopf, informed Groskopf that her employment had been terminated.
- 42. Miley LNU did not provide Groskopf her official termination date, but informed Groskopf that Steris ceased Groskopf's health insurance coverage as of February 27, 2021.
- 43. Defendants terminated Groskopf on or about February 27, 2021.

- 44. Defendants terminated Groskopf because she reported Smith's gender discrimination.
- 45. Defendants terminated Groskopf in retaliation for Groskopf applying for FMLA leave.
- 46. Defendants terminated Groskopf for taking FMLA leave.
- 47. Defendants terminated Groskopf because they perceived her as disabled.
- 48. As a direct and proximate cause of the Defendants' conduct, Groskopf has suffered and will continue to suffer damages.

### **COUNT I: FMLA RETALIATION**

- 49. Groskopf restates each and every foregoing paragraph of this Complaint, above, as if it were fully rewritten herein.
- 50. Pursuant to 29 U.S.C. § 2601 *et seq.*, covered employers are required to provide employees job-protected, unpaid leave for qualified medical and family situations.
- 51. Steris is a covered employer under the FMLA.
- 52. During her employment, Groskopf qualified for FMLA leave.
- 53. During the course of her employment, Groskopf was approved to utilize FMLA leave.
- 54. After Groskopf used qualified FMLA leave, Defendants retaliated against her.
- 55. Defendants retaliated against Groskopf by terminating her employment.
- 56. Defendants willfully retaliated against Groskopf in violation of 29 U.S.C. § 2615(a).
- 57. As a direct and proximate result of Defendants' wrongful conduct, Groskopf is entitled to all damages provided for under 29 U.S.C. § 2617, including liquidated damages, costs, and reasonable attorneys' fees.

### COUNT II: GENDER DISCRIMINATION IN VIOLATION OF R.C. § 4112.01 et seq.

58. Groskopf restates each and every foregoing paragraph of this Complaint, above, as if it were fully rewritten herein.

- 59. Groskopf is female.
- 60. As such, Groskopf is a member of a statutorily protected class based on her gender under R.C. § 4112.01 *et seq*.
- 61. Defendants treated Groskopf differently than other similarly situated employees based on her gender.
- 62. Defendants discriminated against Groskopf on the basis of her gender throughout her employment with the Steris.
- 63. Defendants' discrimination against Groskopf based on her gender violates R.C. § 4112.01 *et seq*.
- 64. Defendants terminated Groskopf's employment without just cause.
- 65. Defendants terminated Groskopf's employment based on her gender.
- 66. Defendants violated R.C. § 4112.01 *et seq.* when Defendants terminated Groskopf's employment based on her gender.
- 67. Groskopf suffered emotional distress as a result of Defendants' conduct and is, therefore, entitled to emotional distress damages pursuant to 42 U.S.C. § 2000e *et seq*.
- 68. As a direct and proximate result of Defendants' conduct, Groskopf has suffered and will continue to suffer damages, including economic and emotional distress damages.

## COUNT III: UNLAWFUL AIDING, ABETTING, AND INCITING OF DISCRIMINATION IN VIOLATION OF R.C. § 4112.02(J)

- 69. Groskopf restates each and every foregoing paragraph of this Complaint, above, as if it were fully rewritten herein.
- 70. Pursuant to R.C. § 4112.02(J), it is unlawful "[f] or any person to aid, abet, incite, compel, or coerce the doing of any act declared by this section to be an unlawful discriminatory practice[.]"

- 71. Smith aided, abetted, incited, coerced, and/or compelled Steris' discriminatory termination of Groskopf's employment.
- 72. Smith violated R.C. § 4112.02(J) and R.C. § 4112.99 by aiding, abetting and inciting discrimination.
- 73. Groskopf suffered emotional distress as a result of Defendants' conduct and is, therefore, entitled to emotional distress damages pursuant to R.C. § 4112.01 *et seq*.
- 74. As a direct and proximate result of Defendants' conduct, Groskopf has suffered and will continue to suffer damages, including economic and emotional distress damages.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Brianna Groskopf respectfully requests that this Honorable Court grant the following relief:

- (a) Issue an order requiring Defendants to restore Groskopf to one of the positions to which she was entitled by virtue of her application and qualifications, and expunge her personnel file of all negative documentation;
- (b) A monetary award against each Defendant to compensate Groskopf for compensatory damages, emotional distress, and other consequential damages, in an amount in excess of \$25,000 per claim to be proven at trial;
- (c) An award of punitive damages against each Defendant in an amount in excess of \$25,000;
- (d) An award of reasonable attorneys' fees and non-taxable costs for Groskopf's claims as allowable under law;
- (e) An award of the taxable costs of this action; and
- (f) An award of such other relief as this Court may deem necessary and proper.

### Respectfully submitted,

### /s/ Kevin A. Buryanek

Kevin A. Buryanek (0099300)
Daniel S. Dubow (0095530)
SPITZ, THE EMPLOYEE'S FIRM
25825 Science Park Drive, Suite 200
Beachwood, OH 44122

Phone: (216) 291-4744 Fax: (216) 291-5744

kevin buryanek@spitzlawfirm.com daniel.dubow@spitzlawfirm.com

Attorneys for Plaintiff Brianna Groskopf

Case: 1:22-cv-02000-JPC Doc #: 1-1 Filed: 11/04/22 10 of 29. PageID #: 15

### JURY DEMAND

Plaintiff Brianna Groskopf demands a trial by jury by the maximum number of jurors permitted.

/s/ Kevin A. Buryanek

Kevin A. Buryanek (0099300)
Daniel S. Dubow (0095530)
SPITZ, THE EMPLOYEE'S FIRM

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EEOC Form 161-B (01/2022)

### U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

### NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Ms. Brianna Groskop 455 Riverdale Dr. Eastlake, OH 44095 From: Cleveland Field Office 1240 E 9th St, Suite 3001 Cleveland, OH 44199

EEOC Charge No. **532-2022-00790** 

EEOC Representative

Legal Unit

Telephone No. **(216) 589-9707** 

(See also the additional information enclosed with this form.)

#### NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA must be filed in a federal or state court <u>WITHIN 90 DAYS</u> of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

More than 180 days have passed since the filing of this charge.

The EEOC is terminating its processing of this charge.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

Digitally Signed By: Karen McDonough

07/11/2022

Enclosures(s) Karen McDonough

Acting Cleveland Field Director

cc: Steries Corporation 5960 Heisley Road Mentor, OH 44060

Vincent Tersigni, Attorney (Respondent)

**Jackson Lewis** 

Patricia Brandt, Attorney (Charging Party)

The Spitz Law Firm

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Enclosure with EEOC Form 161-B (01/2022)

### INFORMATION RELATED TO FILING SUIT UNDER THE LAWS ENFORCED BY THE EEOC

(This information relates to filing suit in Federal or State court <u>under Federal law</u>. If you also plan to sue claiming violations of State law, please be aware that time limits and other provisions of State law may be shorter or more limited than those described below.)

PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), or the Age Discrimination in Employment Act (ADEA):

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge within 90 days of the date you receive this Notice. Therefore, you should keep a record of this date. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed within 90 days of the date this Notice was mailed to you (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

### PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit <u>before 7/1/10</u> – not 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice <u>and</u> within the 2- or 3-year EPA back pay recovery period.

### **ATTORNEY REPRESENTATION** -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do <u>not</u> relieve you of the requirement to bring suit within 90 days.

### ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

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Filing # 86044 / 22CV001304 / LUCCI, EUGENE A. COMMON PLEAS COURT Lake Co Common Pleas Court, Clerk Faith Andrews 10/05/2022 02:05UNTY, OHIO

Case Designation Form Loc. R II(C)(1)

### For all cases except Foreclosure

BRIANNA GROSKOPF	Case No		
VS			
STERIS CORPORATION, et al	Judge		
designation upon the face of the comple "REFILING" must appear in upper cas	previously dismissed under Civ. R. 41 must have a aint that the action is being refiled. The word e letter under the word "COMPLAINT". Directly applaint shall identify the case number of this dismissed		
	Case Categories (Mark one category only)		
Administrative Appeal (Specific ORe Consumer Sales Practices: Actions of 109, 1315, 1317, 1321, 1322, 1333, 1334775, 4905 or 5311 Contract or Quasi ContractCriminalDeclaratory Judgment See Foreclosure Case Designation FormForeign JudgmentMalpractice (specify)Credit Card (CI)Personal InjuryProduct LiabilityProfessional TortProvisional Remedy (Repleving Workers CompensationOther TortX Other Civil Labor and Employme	C Sec.) Section mmenced under applicable section of ORC Chapters: 34, 1345, 1349, 3953, 4505, 4549, 4710, 4712, 4719, an, Attachment, Garnishment)		
applicable. Further, the caption shall particulate cause and controls the time	ot be used if one of the above specific categories is note any statutory provision that is unique to the e within which the case is to proceed, once filed. (EX. ORC Section 3515.10 – Hearing within 30 days.)		
Revised Code Section unique to this pacase is to proceed:	articular cause which controls the time within which the		
/s/ Kevin A. Buryanek	Signature		
Kevin A. Buryanek	Printed name & Registration No.		
Spitz Law Firm, LLC	Firm name		
25825 Science Park Drive	Address		
2216-291-4744	Phone number		

Case: 1:22-cv-02000-JPC Doc #: 1-1 Filed: 11/04/22 14 of 29. PageID #: 19

Filing # 86044 / 22CV001304 / LUCCI, EUGENE A.

## Lake Co Common Pleas Court, Clerk Faith Andrews 10/05/2012/2015/E3COUNTY COUNTY COURT OF COMMON PLEAS CIVIL DIVISION

V.	Case Number		
STERIS CORPORATION Defendant			
INSTRUCTIONS FOR SERVICE			
o Clerk: You are hereby requested to make service up	oon the following by:		
Fed Ex  Certified Mail  Regular Mail  Sheriff Service (Personal)  Sheriff Service (Personal of Personal Service process services to be Served:	or Residential) server:		
Name: STERIS CORPORATION	Name: ADAM SMITH		
Address: 5960 Heisley Road	Address: <u>c/o Steris Corporation</u>		
Address:	Address: 5960 Heisley Road		
City: Mentor State: Ohio Zip: 44060	City: Mentor State: Ohio Zip: 44060		
Name: STERIS CORPORATION  Address: c/o CT CORPORATION SYSTEM  Address: 4400 Easton Commons Way, Suite 125  City: Columbus, State: Ohio Zip: 43219	Name:		

# FAITH ANDREWS CLERK OF COURTS LAKE COUNTY COMMON PLEAS COURT

### ATTENTION ALL PARTIES TO THE CASE

Whether you are represented by an Attorney or representing yourself in this legal action, LAKE COUNTY LOCAL COURT RULES require that all participants familiarize themselves with, and follow the requirements of each court.

Pre-trial Orders and Procedures are available on our website at

www.lakecountyohio.gov/coc

Select Forms and Downloads

Scroll to Pre-trial Orders/ Orders of Procedure

Select the appropriate pre-trial order/procedure for YOUR Respective case and Judge.

If you are unable to access or unclear as to which pre-trial Order/procedure applies to you, contact the Office of the Clerk of Courts, New Case Department (440.350.2657) during normal business hours and a copy will be immediately mailed to you.

FAITH ANDREWS, CLERK OF COURTS

Case: 1:22-cv-02000-JPC Doc #: 1-1 Filed: 11/04/22 16 of 29. PageID #: 21

### SUMMONS COURT OF COMMON PLEAS LAKE COUNTY OHIO

**BRIANNA GROSKOPF** 

Plaintiff

VS.

Case Number: **22CV001304** 

Judge EUGENE A. LUCCI

STERIS CORPORATION et al

Defendant

To the following named DEFENDANT(S):

File Copy

You have been named a Defendant in a complaint filed in the Lake County Court of Common Pleas, Lake County Courthouse, Painesville, Ohio. A copy of the complaint is attached hereto. The name and address of the plaintiff's attorney is:

KEVIN A BURYANEK 28525 SCIENCE PARK DRIVE SUITE 200 BEACHWOOD OH 44122

You are hereby summoned and required to do the following:

- 1. Within 28 days after service of this Summons upon you, serve a copy of an Answer to the Complaint on the Plaintiff's Attorney or on the Plaintiff, if he/she has no attorney of record;
- 2. Within 3 days after you serve the Plaintiff or the Plaintiff's Attorney, file an Answer with your original signature with the Lake County Clerk of Court.

Calculations of time are exclusive of the day of service.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

Faith Andrews Clerk, Court of Common Pleas Lake County, Ohio 25 N. Park Place Painesville OH 44077

Deputy Clerk

October 6, 2022

22CV001304

Certified Article Number
9414 7266 9904 2198 1389 28
SENDER'S RECORD

9 414 7266 9904 2198 1389 28
STERIS CORPORATION
CO CT CORPORATION SYSTEM
STATUTORY AGENT
4400 EASTON COMMONS WAY SUITE 1
COLUMBUS, OH 43219

Certified Article Number
9414 7266 9904 2198 1389 35
SENDER'S RECORD

22CV001304 9 414 7266 9904 2198 1389 35 STERIS CORPORATION 5960 HEISLEY ROAD

Certified Article Number
9414 7266 9904 2198 1389 42
SENDER'S RECORD

22CV001304 9 414 7266 9904 2198 1389 42

ADAM SMITH CO STERIS CORPORATION 5960 HEISLEY ROAD MENTOR, OH 44060

MENTOR, OH 44060

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4400 EASTON COMMONS WAY SUI COLUMBUS, OH 43219

Reference Information

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USP

22CV001304

STATUTORY AGENT

# 2000-JPC Doc #: 1-1 Filed: 11/04/22 19 of 29

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Sent to:

ADAM SMITH CO STERIS CORPORATION 5960 HEISLEY ROAD MENTOR, OH 44060

### Reference Information

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PS Form 3800, Facsimile, July 2015

22CV001304

# 2000-JPC Doc #: 1-1 Filed: 11/04/22 21 of 29

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Certified Mail Restricted Delivery \$

Postage \$

Sent to:

STERIS CORPORATION
5960 HEISLEY ROAD

MENTOR, OH 44060

**Total Postage and Fees** 

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### Reference Information

22CV001304 9 414 7266 9904 2198 1389 35

tL

PS Form 3800, Facsimile, July 2015

# 00-JPC Doc.#: 1-1 Filed: 11/04/22 23 of 29

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Filing # 87099 / 22CV001304 / LUCCI, EUGENE A.

Lake Co Common Pleas Court, Clerk Faith Andrews 10/13/2022 02:53 PM

### IN THE COURT OF COMMON PLEAS LAKE COUNTY, OHIO

BRIANNA GROSKOPF,	) CASE NO. 22 CV 00	1304
Plaintiff,	) ) JUDGE EUGENE A	LUCCI
VS.	RULE 4.7 WAIVER	
STERIS CORPORATION, et al.,	) <u>SERVICE OF SUM</u>	<u>MONS</u>
Defendants.	)	

To: Kevin A. Buryanek, Esq.

I have received your request to waive service of a summons in this action along with a copy of the complaint. I represent Defendant STERIS Corporation, et al. ("Defendant") in the above-captioned matter. Defendant agrees to save the expense of serving a summons and complaint in this case.

By signing this waiver of the service of summons, Defendant understands it will keep all defenses or objections to the lawsuit including, but not limited to, a believe the lawsuit is groundless, the court's jurisdiction, and the venue of the action, except for objections to the absence of a summons or of service.

Defendant also understands it must file and serve an answer or a motion under Rule 12 within 60 days from October 6, 2022, the date when this request was sent. If Defendant fails to do so, a default judgment could be entered against them.

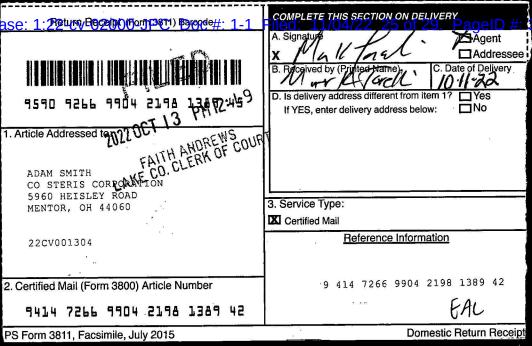
Date: October 13, 2022

/s/ Vincent J. Tersigni

Vincent J. Tersigni (0040222)
Lyndsay M. Ross (0099248)
Jackson Lewis P.C.
Park Center Plaza I, Suite 400
6100 Oak Tree Boulevard
Cleveland, OH 44131
(216) 750-0404 (phone)
(216) 750-0826 (fax)
Vincent Tersigni@JacksonLewis.com
Lyndsay Ross@JacksonLewis.com

Lynusay, Ross@JacksonLewis.com

Attorneys for Defendant, STERIS Corporation

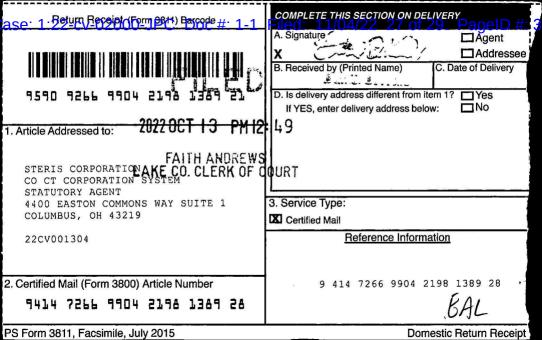




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